

James E. Cecchi
Donald A. Ecklund
**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.**
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700

Liaison Counsel for Gregory L. Thorpe

Robert V. Prongay
Charles H. Linehan
Pavithra Rajesh
GLANCY PRONGAY & MURRAY LLP
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Fax: (310) 201-9160

Counsel for Gregory L. Thorpe

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHRISTOPHER ARBOUR, Individually
and On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

TINGO GROUP, INC., DOZY
MMOBUOSI, DARREN MERCER, and
KEVIN CHEN,

Defendants.

Case No. 2:23-cv-03151-ES-MAH

**NOTICE OF WITHDRAWAL OF
MOTION OF GREGORY L. THORPE
FOR CONSOLIDATION OF RELATED
ACTIONS, APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF
COUNSEL**

MARK J. BLOEDORN, Individually and
On Behalf Of All Others Similarly Situated,

Plaintiff,

v.

TINGO GROUP INC., DARREN
MERCER, HAO (KEVIN) CHEN, DOZY
MMOBUOSI,

Defendants.

Case No. 2:23-cv-03153-ES-MAH

appointment as lead plaintiff, and approval of lead counsel in connection with the above-captioned securities fraud class actions (Dkt. No. 5, the “Motion”). Five similar motions were filed by other putative class members in this action (Dkt. Nos. 3, 4, 6, 7, 8).

The Private Securities Litigation Reform Act of 1995 (“PSLRA”) directs the Court to appoint the “most adequate plaintiff” as lead plaintiff, and provides a rebuttable presumption that the most adequate movant is the person or group that, among other things, has “the largest financial interest in the relief sought by the class.” 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Having reviewed the competing motions and supporting papers provided by the other movants seeking appointment as lead plaintiff, it appears that Mr. Thorpe does not have the largest financial interest in the relief sought by the class, as required by the PSLRA. As such, Mr. Thorpe hereby withdraws his Motion.

By this withdrawal, Mr. Thorpe does not waive his rights to participate and recover as a class member in this litigation.

DATED: August 22, 2023

Respectfully submitted,

**CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO, P.C.**

By: s/ James E. Cecchi

James E. Cecchi

Donald A. Ecklund

Kevin G. Cooper

5 Becker Farm Road

Roseland, New Jersey 07068

Telephone: (973) 994-1700

Email: jcecchi@carellabyrne.com

decklund@carellabyrne.com

kcooper@carellabyrne.com

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GLANCY PRONGAY & MURRAY LLP

Robert V. Prongay

Charles H. Linehan

Pavithra Rajesh

1925 Century Park East, Suite 2100

Los Angeles, California 90067

Telephone: (310) 201-9150

Email: clinehan@glancylaw.com

Counsel for Gregory L. Thorpe

SO ORDERED

s/Michael A. Hammer

Michael A. Hammer, U.S.M.J.

Date: 8/31/2023